

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

ALFA LIFE INSURANCE
CORPORATION

Plaintiff,

v.

ADVANTAGE CONSULTING
GROUP, INC. AND RICHARD E.
KNUTSON

Defendants.

Civil Action No.:
CV-05-775-C

REPORT OF PARTIES' PLANNING MEETING

The parties submit the following written report, pursuant to Rule 26(f):

1. Meeting

A meeting was held on November 22, 2005, at the offices of Gray & Associates, L.L.C., 3800 Colonnade Parkway, Suite 545, Birmingham, Alabama. Present were William P. Gray, Jr. and Douglas N. Robertson, Plaintiff's attorneys, and Anne L. Wohlfeld and J. Forrest Hinton, Defendants' attorneys. The parties jointly propose to the court the following:

2. Pleadings

All parties should have until February 15, 2006 to add additional parties and amend pleadings.

3. Discovery

(a) Initial disclosures under Rule 26(a)(1) will be exchanged by January 15, 2006.

(b) Interrogatories will be limited to 50 by each party to another party. Responses are due 30 days after service, unless extended by agreement of the parties.

(c) Document requests will be limited to 30 by each party to another party. Responses are due 30 days after service, unless extended by agreement of the parties.

(d) Requests to admit will be limited to 25 facts and 25 documents by each party to another party. Responses are due 30 days after service, unless extended by agreement of the parties.

(e) Depositions of non-experts will be limited to 15 by each party. Each deposition will be limited to 7 hours, unless extended by agreement of the parties.

(f) Disclosure and production of written reports from Plaintiff's retained experts under Rule 26(a)(2) are due August 15, 2006. Disclosure and production of written reports from Defendants' retained experts are due September 15, 2006.

(g) Depositions of retained experts shall be completed by October 15, 2006.

(h) Supplementation under Rule 26(e) is due within 30 days after the discovery of new information, but in any event, no later than September 30, 2006.

(i) Discovery cut-off date is November 1, 2006.

4. Dispositive motions

Dispositive motions will be served and filed by December 1, 2006. Responses are due by January 15, 2007.

5. Settlement

Settlement cannot be evaluated until after the experts' reports have been received. The parties request that the court schedule a conference to discuss settlement after September 15, 2006.

6. Trial

(a) Witness and exhibits lists under Rule 26(b)(3) should be due by March 1, 2007.

(b) Parties should have 10 business days after service of witness and exhibits lists to specify objections under Rule 26(a)(3).

(c) The case should be ready for trial by April 1, 2007.

Respectfully Submitted,

/s/ William P. Gray, Jr.

WILLIAM P. GRAY, JR. (ASB-5268-R78W)
DOUGLAS N. ROBERTSON (ASB-1128-O76R)
Attorneys for Plaintiff,
Alfa Life Insurance Corporation

OF COUNSEL:

GRAY & ASSOCIATES, L.L.C.
3800 Colonnade Parkway, Suite 545
Birmingham, Alabama 35243
Phone (205) 968-0900
Facsimile (205) 968-6534

/s/ Anne L. Wohlfeld

J. FORREST HINTON (ASB-3744-N475)

ANNE L. WOHLFELD (ASB-6615-E60W)

OF COUNSEL:

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ, PC
1600 Wachovia Tower
420 20th Street North
Birmingham, Alabama 35203-5202